

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454-GKF-JFJ
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

**DECLARATION OF MICHAEL S. SAWYER IN SUPPORT OF PLAINTIFF VIDEO
GAMING TECHNOLOGY, INC.’S OPPOSITION TO DEFENDANTS’ MOTION TO
STRIKE DECLARATIONS OF STACY FRIEDMAN AND JOSH DAVIS SUBMITTED
IN SUPPORT OF PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. (“VGT”). I was admitted *pro hac vice* in this case on August 9, 2017.

2. Attached as **Exhibit O** is a true and correct copy of excerpts from the transcript of the deposition of Stacy Friedman, taken on September 24, 2018.

3. Attached as **Exhibit P** is a true and correct copy of VGT’s Rule 26(a)(1) Initial Disclosures, dated October 6, 2017.

4. Attached as **Exhibit Q** is a true and correct copy of VGT’s Objections and Responses to Defendant Castle Hill Studio LLC’s First Set of Interrogatories (Nos. 1–13), dated November 22, 2017.

5. Attached as **Exhibit S** is a true and correct copy of excerpts from the transcript of the deposition of Robert M. Zeidman, taken on September 28, 2018.

6. Attached as **Exhibit T** is a true and correct copy of excerpts from Plaintiff's First Supplemental Objections and Responses to Defendant Castle Hill Studio LLC's First Set of Interrogatories (Nos. 1–13), dated December 27, 2017.

7. Attached as **Exhibit U** is a true and correct copy of excerpts from Plaintiff's Sixth Supplemental Objections and Responses to Defendant Castle Hill Studio LLC's First Set of Interrogatories (Nos. 1–13), dated August 3, 2018.

8. Attached as **Exhibit V** is a true and correct copy of excerpts from the transcript of the deposition of Paul Suggs, taken on June 8, 2018.

9. Attached as **Exhibit W** is a true and correct copy of excerpts from the transcript of the Rule 30(b)(6) deposition of Alan R. Roireau, taken on August 1, 2018.

10. Attached as **Exhibit X** is a true and correct copy of a letter from Michael S. Sawyer to Robert C. Gill, dated April 11, 2018.

11. I declare under penalty of perjury that the foregoing is true and correct.
Executed on December 14, 2018 in Washington, D.C.

/s/ Michael S. Sawyer
Michael S. Sawyer

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2018, I filed a copy of the foregoing via ECF,
which caused service to be effected on the following counsel for Defendants:

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